

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LARHONDA BIGGLES, as §
ADMINISTRATRIX OF THE §
ESTATE OF JAQUAREE §
SIMMONS, §
Plaintiff, §
§
v. § Civil Action No.: 4:22-cv-3326
§
HARRIS COUNTY, TEXAS, *et. al.*, §
Defendants. §

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

Now comes the Movant, Jennifer F. Callan, pursuant to Local Rule 83.2 of the United States District Court for the Southern District of Texas, respectfully requesting that this Honorable Court enter an Order granting Movant leave to withdraw as counsel of record for Defendant HARRIS COUNTY in the above-captioned cause. In support of this motion, Movant states as follows:

1. Movant previously appeared as counsel on behalf of Defendant Harris County. Movant's last day with the Harris County Attorney's Office is March 24, 2023, and thus, she wishes to be removed as counsel for Defendant Harris County.
2. Stan Clark will be taking over as attorney-in-charge once the administrative stay is lifted by the Court. Mr. Clark will be filing a separate notice of designation of lead counsel.
3. This motion to withdraw is not being made for the purposes of delay.
4. **Certificate of Conference.** Movant conferred with opposing counsel via email on March 13, 2023 and March 14, 2023 regarding the relief requested in this motion, and they are unopposed.

WHEREFORE, PREMISES CONSIDERED, Jennifer F. Callan, respectfully requests that the Court grant the instant Motion.

Respectfully submitted,

OF COUNSEL:

CHRISTIAN MENEFEE
TEXAS BAR NO. 24088049
HARRIS COUNTY ATTORNEY

Date: March 20, 2023.

By: /s/ Jennifer F. Callan
JENNIFER F. CALLAN
Sr. Assistant County Attorney
ATTORNEY-IN-CHARGE
State Bar No. 00793715
Fed. Bar No. 22721
Tel: (713) 274-5146 (direct)
jennifer.callan@harriscountytx.gov

GREGORY BURNETT
Sr. Assistant County Attorney
State Bar No. 24057785
Fed. Bar No. 3785139
Tel: (713) 274-5224 (direct)
gregory.burnett@harriscountytx.gov

Harris County Attorney's Office
1019 Congress
Houston, Texas 77002

Attorneys for County Defendants

CERTIFICATE OF SERVICE

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this certificate is attached was filed with the clerk of the court using CM/ECF system, which will send electronic notification for those listed of record who receive electronically filed documents.

- John J Coyle, McEldrew Purtell, 123 S. Broad St., Suite 2250, Philadelphia, PA 19109; and Daniel Cienfuegos, Jr., AK Law Firm, 3501 Allen Parkway, Houston, TX 77019. Attorneys for Plaintiff
- David Nachtigall, David Nachtigall Attorney at Law, PLLC, 1545 Heights, Suite 100, Houston, Texas 77008. Attorney for Defendants Galindez and Villaloboz
- Richard Kuniansky, Kuniansky & Associates, 440 Louisiana, Suite 1440, Houston, Texas 77002. Attorney for Defendants Brummett, D. Rodriguez and McFarland
- David Adler, 6750 W. Loop S., Suite #120, Bellaire, Texas 77401. Attorney for Defendants Barrett, Mallery, Westmoreland, Saucier and Walker

/s/ Jennifer F. Callan

Jennifer F. Callan